

UNITED STATES DISTRICT COURT
for the
Southern District of Florida
Miami Division

GAMES WORKSHOP LIMITED,
An individual,

Plaintiff,

v.

JNP DESIGNS LLC, et al.,

Defendants.

Case No.: 1:25-cv-21476-RKA

Declaration of Nitza M. Marquez-Perez

I, Nitza M. Marquez-Perez, make the following declaration pursuant to 28 U.S.C. § 1746, and state that under penalty of perjury the following is true and correct to the best of my knowledge and belief:

(1) JNP Designs LLC is, and at all relevant times has been, a Florida-organized, manager-managed limited liability company. I am its sole manager, sole member, and the only person listed on the company's latest annual report filed with the Florida Department of State (see the attached Sunbiz screenshot).

(2) Florida law requires that a domestic limited liability company be served "by service on its registered agent" unless and until a process server, after the statutorily required diligence, is unable to do so. See Fla. Stat. § 48.062(2)–(5).

(3) Because I am the company's only registered agent and I was never served, the statutory prerequisites for valid service have not been met.

(4) Neither I nor anyone at my address was ever approached by a process server, received a summons by hand delivery via a certified process server, nor was any summons left at the premises.

(5) I have never attempted to evade service.

(6) The first time I learned of this lawsuit was when I received an e-mail from Plaintiff's counsel, Javier Sobrado, Esq., attaching a motion for default.

Declaration of Nitza M. Marquez-Perez

Case No.: 1:25-cv-21476-RKA

Page 2 of 3

(7) After receiving the email, I immediately retained an attorney to review the docket and challenge service.

(8) Because no valid service has occurred, the Court lacks personal jurisdiction over JNP Designs LLC.

(9) Service was likewise defective under Federal Rule of Civil Procedure 4(h), which governs service on a domestic limited-liability company.

(10) I respectfully request that the Court quash any purported service, vacate the clerk's default, and deny Plaintiff's motion for default judgment.

Dated: July 8, 2025

Respectfully submitted,

Signed by:

By _____
Nitza M. Marquez-Perez
Agent/Owner/Manager of JNP Designs LLC
Email: jnlaserdesign@gmail.com
Phone: (305) 979-0422

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of this document was served by Pacer to the following:

Counsel for Plaintiffs

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Case No.: 1:25-cv-21476-RKA

Page 3 of 3

Attorney for Defendant JNP Designs LLC

Michael Van Cleve, Law

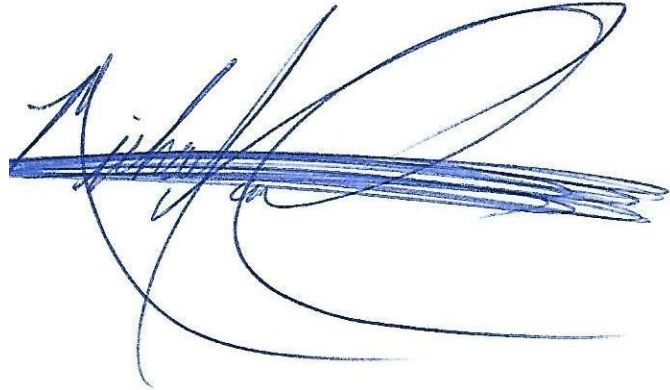
Michael Van Cleve, Esquire

99 NW 183rd Street, Room 242B

North Miami Beach, FL 33169

Telephone: (786) 309-9043

Email: michael@michaelvanclelaw.com

A handwritten signature in blue ink, appearing to read 'Michael Van Cleve', with a large, stylized flourish extending from the end of the signature.

By _____

MICHAEL VAN CLEVE, ESQ.

/s/Michael Van Cleve, Esq.

FLORIDA BAR NO.: 89413